Dear Bud,

11/4/74

Carmen did not send Idl the check for my expenses on the discovery trip. Paying Jim's and my bills with my Bancamericard cleaned our bank account out, so I'd appreciate the repayment as soon as you can send the check. Carmen has the records. Or you do. I've forgotten to whom I gave them.

On the trip just ended my total out-of-pocket expenses were $125.75, plus or minus pennies only. This included everything not on the motel tab, such as supplies, cabs, etc.

If you examine the motel tabs, you'll find a fair amount of Jim's food on mine. The two reasons may amuse you. More often it was because he'd get an idea in the middle of eating or dash off as he finished without waiting for me to finish. But he did get preoccupied enough to just forget his check! Once even the chef came to me with it! One of the more amusing (to me) such incidents was when he'd gotten a cheeseburger and fries, took two bites of the sandwich, got an idea and fled back to the room. Everybody was worried over an assumed dislike of the sandwich.

I bought what I'd need to do the measuring job at the flophouse when it suddenly occured to me that if we need the measurements we'll also need a witness. So, instead of doing that Saturday morning and catching the late plane, for which we were both too tired in any event, I made arrangements for a local investigater, former state trooper, to do this. Besides, I didn't have McDonnell's windowsill measurements. As soon as I find them, if they are in Bob's notes, I'll complete the arrangements.

McDonnell reminds me of an incident of the past.

In the late spring of 1971, when I'd begun extra investigation for this hearing and looking forward to a trial, there were two things I thought should be done, with Jim's agreement, that you nixed. With the second I improvised as much as I could without travel. I have something in case we need it. With the first, getting pictures, we really had no alternative. You offered me $50 toward this and I refused to accept it. We have since used a number of these pictures and we will have need for each remaining one before the trial is over.

They provided the basis for McDonnell's testimony on everything to which he testified other than the material I showed him in Blackwell's office. Jims used several in the petition. At least one and I think two went into evidence in the hearing. And they have enabled me to arrange for a high-ranking police official to testify for us during the trial! I have spoken to him. (I did a lot of running around of which you were not aware instead of partying.) In fact, this work was essential to what success we had in the Carlisle discovery and it will be important in the trial when we issue subpenas and alleged the withholding of exculpatory evidence, for I have pinpointed official possession of withheld pictures that I have seen and on which I have detailed notes. You will want to knowall this for the future.

I can't now give you a to-the-penny accounting of my actual costs. I'd asked for payment of them, nothing for the time. As best I can now recall these expenses, and it will be close enough, it was a trip from here to New York City for two days. Travel expenses were something like $60.00, including parking my car at the station. Because of the nature of what I was doing I did not want to stay with friends, so I was at the Roosevelt, the best location for the places I had to go to with a bad foot. I still had to use cabs, perhaps $10. (I don't recall the charge at the Roosevelt but we can approximate that from what you know better than I, what it may be.) And I spent about $100 on pictures, to the wire-services and in making working duplicates for Jim to use in his work. (He or I still have the duplicate negatives so we can replace what has been used in the various proceedings.) I didn't spend much on food. I'd say $15-$ 20

would cover it, even with a minimum breakfast at the hotel costing $2.50.

In my opinion this has turned out to be what I expected it to be, one of the best expenditures on the case. It comes to $190 plus whatever you think the single for two nights at the Roosevelt was. I'd appreciate getting it now that you have used and will again use this work. And what it has meant from the knowledge it gave me.

One of the by-products I believe you will want to hold in mind for the trial is that I can now pinpoint as I recall without consulting my notes three reels of contemporaneous, almost entirely unpublished 35mm film that includes the very first at-the-scene pictures. I can also establish that these are in the possession of the FBI, should have been given to the Memphis police, and include the exculpatory as well as the informative. Even a plainclothes man, armed, standing over King's unmoved corpse. His face is clearly visible, etc. White man, perhaps FBI if not detective. However, I believe the withholding will be important as it will be if the subpena is not honored. And I know where to issue another subpena if the FBI and Memphis police do not honor the one on them. It should make a nice, junior-grade sensation at the trial.

After you left I returned to the efforts I began prior to the beginning of the hearing. I have some witnesses you have not met. They are willing to testify and can be valuable. These range from high-ranking police to Jimmy's guards. One will testify to a number of things, including that from living with and long and many conversations with Jimmy he believes Jimmy the kind of man who'd not do anything violent, especially not kill. If I can spend some time in Memphis before the trial, I rather expect I can come up with a series of these guards who will so testify and include other things that can be helpful. The high official was at the scene, was not used as a minitrial witness and I'll have to spend more time with him. I know he'll testify to the moving and handling of the bundle and all that means. (Without the above pictures I'd not have been able to arrange for this and what else a real interview can show this official can testify to. I suspect it is much more. But it and other things will require some time in Memphis prior to trial.)

After you left I also developed some leads on finding the man with the assassination on his conscience, the man I have on tape withk this. Prior to our leaving I also learned of those now still in Memphis who can help identify and locate him. I suspect he is using an assumed name. If we get a trial order, I also suspect Jerry Hurf will be more cooperative.

Yesterday I cleaned up what I'll address of the accumulation of mail and orders. Now I have to begin setting up new files to use in closing argument and refutation and looking forward to trial. This means I'll have to statr with legal-sized materials. So, if Carmen has second-hand legal-sized folers to get rid of, I'd appreciate her holding them for me to avoid the cost of buying any. I never use them and can easily use discarded ones. I bought a box in Memphis but gave them to Jim.

At some point prior to completion of Jim's draft of closing argument I think it mightbe be helpful to have a confab that includes Bill on the evidence we got in because it was essential to effectiveness of counsel. I think this can make a significant part of the argument and can have the kind of political consequences we want.

Meanwhile, I'd appreciate the refund of these expenses. Putting them out has cleaned us out. Thanks.

Sincerely,